



May 21, 2020

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912
(617) 918-1102

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552, I am requesting copies and/or access to records held at EPA's Region 1 office. Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Clean Air Act (CAA), the Clean Water Act (CWA), the Toxic Substances Control Act (TSCA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of Evans Plating, also known as DFI Electroplating, at 50 Waterman Avenue, North Providence and 2 Putnam Avenue in Johnston, Rhode Island.

Company Information

Evans Plating operated two facilities at 50 Waterman Avenue in North Providence and at 2 Putnam Avenue in Johnston, around 200 yards apart from each other, from around 1952 until the 2000s. Alternate names for the entity include:

- Evans Plating Company
- Evans Plating Corporation
- DFI Electroplating

Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

RCRA Requested Documents

We understand that hazardous waste generated by Evans Plating at 2 Putnam Avenue, Johnston, RI was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned

the RCRA facility ID# RID000769661. Additionally, Evans Plating/DFI Electroplating at 50 Waterman Avenue, North Providence, RI was assigned the RCRA facility ID# RID001191931.

Based on documentation received from the Rhode Island Department of Environmental Management (RIDEM), we know that these facilities conducted industrial plating for the U.S. military, and the electronic and general hardware industries. We are also aware of the following inspection and sampling events:

- January 1999 - Joint EPA and RIDEM RCRA compliance evaluation inspection to both the 2 Putnam Avenue and 50 Waterman Avenue facilities.
- March 1999 - EPA gathered soil samples during RCRA compliance evaluation inspection at both the 2 Putnam Avenue and 50 Waterman Avenue facilities.

In addition to reports, memos, correspondence, and other documentation concerning the above events, we request the following documents relating to this facility produced by the company as required by the RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Any hazardous waste manifests
- Inspections and correspondence, including correspondence with the Rhode Island Department of Environmental Management (RIDEM)
- Documents related to any administrative or judicial enforcement actions for this facility or these parties
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports

Additionally, Evans Plating at 50 Waterman, North Providence was classified as a State Hazardous Waste Site by the state of Rhode Island and was assigned the facility ID# SR-24-0447. We request work plans and closure documentation related to this facility and any available registration/application, inspection files, and/or correspondence.

AIR Requested Documents

We understand that Evans Plating at 2 Putnam Avenue, Johnston, RI operated under the regulation of the Clean Air Act and may have been identified by the ID# AIR504 and Evans Plating at 50 Waterman Avenue, North Providence may have been identified with the ID# RI0000004400700703. We request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Any sampling or monitoring results
- Any enforcement files
- Any available correspondence

NPDES Requested Documents

We understand that Evans Plating at 50 Waterman Avenue, North Providence and 2 Putnam Avenue, Johnston, Rhode Island operated under the regulation of the Clean Water Act, which required point source dischargers of pollutants to obtain a discharge permit through the National Pollutant Discharge Elimination System (NPDES). Evans Plating was assigned the facility ID# RIU250431.

Evans Plating is also believed to be an indirect discharger, discharging process waste water to the publicly-owned treatment works (POTW), a POTW now run by the Narraganset Bay Commission (NBC). As a metal plater, Evans Plating is believed to be subject to categorical pretreatment standard, to be imposed by the POTW.

We therefore request the following documents related to this facility:

- NPDES registration and permit application files
- Inspection files
- Correspondence files
- Discharge monitoring reports
- Any pretreatment permit issued by the POTW, in this case believed to be NBC and its predecessor agency
- Any other documents relating to the these facilities' discharge to the municipal sewers including monitoring reports, inspections, bypass or upset notifications, enforcement, documents, or other documents relating to these indirect dischargers and discharges to the POTW.

Civil Enforcement Actions Requested Documents

The US EPA filed at least three civil enforcement cases concerning hazardous waste management and effluent pretreatment violations at the Evans Plating at 50 Waterman Avenue, North Providence and/or 2 Putnam Avenue in Johnston, Rhode Island. The docket numbers for these three civil enforcement actions are as follows:

- 01-2001-0179
- 01-2002-0189
- 01-2002-0204

We therefore request the following documents related to these three enforcement cases and any other civil enforcement cases concerning this facility:

- Inspection files
- Correspondence files
- Do on specific chemicals used and released into industrial wastewater

TSCA PCB Requested Documents

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at DFI Electroplating and/or Evans Plating at 50 Waterman Avenue, North Providence and/or 2 Putnam Avenue, Johnston, RI. We therefore request the following documents related to PCBs and this site:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving this party, (under its various names) and these locations

EPCRA-TRI Requested Documents

We understand that Evans Plating at 50 Waterman, North Providence, RI is believed to be subject to EPCRA section 313 Toxic Release Inventory (TRI) reporting requirements and was required to file an annual report to document the release of certain chemicals. The company was assigned the following TRI facility ID: 02911VNSPL50WAT.

This request seeks all such reports filed by Evans Plating (under its various names), from the 1987 reporting year forward. This request also seeks any formal or informal enforcement action related to this facility's EPCRA compliance, as well as any EPA, RIDEM, or other correspondence concerning this facility's EPCRA compliance.

Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at HBergen@historyassociates.com.

Sincerely,

Hilary Bergen